

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**
Harrisburg Division

IN RE: SHAWN C. STROOP and AMY R. STROOP	Case No. 1:21-bk-00708-HWV
Freedom Mortgage Corporation, Movant	Chapter 13
vs.	
SHAWN C. STROOP and AMY R. STROOP, Debtor	

**OBJECTION TO CONFIRMATION
OF DEBTOR(S)' CHAPTER 13 PLAN**

Freedom Mortgage Corporation ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor(s)' Chapter 13 Plan* (Doc 45), and states as follows:

1. The Debtor(s) filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on March 31, 2021.

2. Movant holds a security interest in the Debtor(s)' real property located at 15 BALLAST LN, Stewartstown, PA 17363 (the "Property"), by virtue of a Mortgage which is recorded as instrument Number 2021029841 in Official Records of York County, Pennsylvania. Said Mortgage secures a Note in the amount of \$243,550.00.

3. The Debtor(s) filed a Chapter 13 Plan (the "Plan") on August 23, 2021 (Doc 45), to which Movant objects for the following reasons:

4. Movant filed a Proof of Claim in this case on August 10, 2021 (Claim No. 15-1).

5. The Plan includes payments toward the Note and Mortgage with Movant, however

the figures used by the Debtor(s) are inaccurate and do not conform to Movant's timely-filed Proof of Claim. The correct pre-petition arrearage due Movant is \$930.96, whereas the Plan proposes to pay only \$0.00. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed. Movant objects to any plan which proposes to pay it anything less than \$930.96 as the pre-petition arrearage over the life of the plan.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/ Mario Hanyon

Mario Hanyon

(Bar No. 203993)

Attorney for Creditor

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Chapter 13

Freedom Mortgage Corporation,
Movant

vs.

SHAWN C. STROOP and AMY R. STROOP,
Debtor

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection To Confirmation Of Debtor(S)' Chapter 13 Plan has been electronically served or mailed, postage prepaid on September 3, 2021 to the following:

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/s/ Mario Hanyon
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